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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
 RECORDS, LLC, CONCORD BICYCLE
 ASSETS, LLC, CMGI RECORDED MUSIC
 ASSETS LLC, SONY MUSIC
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER
 KAHLE, KAHLE/AUSTIN FOUNDATION,
 GEORGE BLOOD, and GEORGE BLOOD,
 L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

**Fourth Stipulation and Proposed Order to
 Extend Stay of Proceedings**

Pursuant to Civil Local Rule 6-1(b) and Section 7 of the Court's Standing Orders, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, "Plaintiffs") and Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, and George Blood LP (collectively, "Defendants") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), hereby stipulate as follows:

WHEREAS, on June 2, 2025, the Court granted the Parties' third stipulation to stay the case for thirty (30) days, which is set to expire on July 7, 2025, ECF No. 172;

WHEREAS, the Parties are engaged in ongoing settlement discussions and believe that extending the current stay for an additional thirty (30) days will facilitate resolution of this matter without further involvement of the Court;

WHEREAS, in the event that settlement discussions do not result in a resolution, the Parties agree to confer and submit a proposed schedule to the Court to reset case deadlines;

NOW, THEREFORE, the Parties hereby stipulate and respectfully request the Court to order as follows:

1. All proceedings and deadlines in this case shall be stayed through and including August 6, 2025 to allow the Parties to continue their settlement discussions.
2. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
3. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

IT IS SO STIPULATED.

Dated: July 3, 2025

/s/ Matthew J. Oppenheim

Matthew J. Oppenheim (*pro hac vice*)
Corey Miller (*pro hac vice*)
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/s/ Andrew M. Gass

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***Attorneys for Defendants Internet Archive,
Brewster Kahle, Kahle/Austin Foundation,
George Blood, and George Blood L.P.***

SIGNATURE ATTESTATION

Pursuant to Civ. L.R. 5.1, I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered for inspection upon request.

Dated: July 3, 2025

OPPENHEIM + ZEBRAK, LLP

/s/ Matthew J. Oppenheim

Matthew J. Oppenheim

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

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L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

**[Proposed] Order to Extend Stay of
Proceedings**

The Court, having considered the Parties' Fourth Stipulation to Extend Stay of Proceedings, and good cause having been shown, hereby orders as follows:

1. All proceedings and deadlines in this case shall be stayed through and including August 6, 2025 to allow the Parties to continue their settlement discussions.
2. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
3. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

IT IS SO ORDERED.

Dated: _____

MAXINE M. CHESNEY
United States District Judge